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April 3, 2025

The Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

RE: *United States v. Jahreek Bush*
23 Cr. 545-1 (KMK)

Dear Judge Karas:

On January 31, 2025, I was appointed to represent the defendant Jahreek Bush in the above referenced matter pursuant to the provisions of the Criminal Justice Act ("CJA"), 18 U.S.C. § 3006. Oral argument on the defendant's motion for a new trial has been scheduled for May 6, 2025. However, the Department of Probation has informed me that the current timeline to deliver a Presentence Report will require an interview with Mr. Bush before his motion is heard and decided. I would respectfully petition this Court to set a sentencing date in September 2025 and to set a new date for disclosure of the draft presentence report for early June 2025 and disclosure of the final presentence report for a date in late June 2025. The Government consents to the adjournment of sentencing only to a date in July or August 2025 because Mr. Bush's trial ended in the summer of 2024. As I am newly appointed, counsel submits that a sentencing date in September 2025 would allow the defense sufficient time to continue to meet and prepare for oral argument and if necessary, then obtain material that would be provided as mitigation or assess whether Mr. Bush's case requires the appointment of a mitigation expert. For the aforementioned reasons, the defense respectfully requests that the Court set a date for sentencing in September 2025 and extend the presentence disclosure dates accordingly.

The Court's time and consideration of this request are greatly appreciated.
Sentence is adjourned to 7/31/25, at 11:00. This should
provide ample time for counsel, who was appointed two
months ago, to be prepared for sentence. Oral
argument can proceed as scheduled.

Respectfully submitted,

/s/

So Ordered
A handwritten signature in black ink, appearing to read "Calvin H. Scholar", is written over the words "So Ordered".
4/3/25

Calvin H. Scholar

cc: United States Attorney for the
Southern District of New York